

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

John J. Smith, III
Carol M. Smith

Debtors

Chapter 13

Bankruptcy No.21-12762-PMM

OBJECTION OF CHAPTER 13 TRUSTEE
TO CONFIRMATION OF PLAN OF DEBTORS

AND NOW comes Scott F. Waterman, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtors, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtors have failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtors to enable the standing trustee to evaluate the Plan for confirmation, as follows:

Debtor(s) has/have failed to file and/or supply monthly operating reports as required by Bankruptcy Rule 2015 and Local Bankruptcy Rule 2015-1.

Debtor(s) has/have failed to provide an appropriate contribution affidavit as directed at the meeting of creditors held under 11 U.S.C. Section 341(a).

The claims and/or claim amounts identified in the Plan are inconsistent with one or more filed proofs of claim.

The Plan is unclear and/or incorrect as to how the secured and priority claims are to be treated and/or paid by the standing trustee.

WHEREFORE, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ Scott F. Waterman

Scott F. Waterman, Esquire
Chapter 13 Standing Trustee